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24 Plaintiffs

25 UNITED STATES DISTRICT COURT

26 CENTRAL DISTRICT OF CALIFORNIA
27 SOUTHERN DIVISION

28 IN RE: TOYOTA MOTOR CORP.
UNINTENDED ACCELERATION
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

Case No. 8:10ML2151 JVS (FMOx)

RESPONSE REGARDING TOYOTA'S
FILING OF REDACTED / SEALED
DOCUMENTS ON CHOICE OF LAW

29 This Document Relates To:

30 ALL CASES

Toyota attempts to deflect its improper confidentiality designations by accusing Plaintiffs of failing to follow the protective order procedures (*see* Dkt. No. 1288 p. 2 lines 21-23) and accuses Plaintiffs of “attempting to circumvent” the Protective Order.

No such circumvention was intended, or took place. As Toyota notes in its response “the Court invited Plaintiffs to submit their views” and we did so. The Court asked Plaintiffs for their views and Plaintiffs properly expressed such views. The facts stated are undisputed – Toyota has littered its filing with improper confidentiality designations that are readily apparent – satellite litigation is unnecessary.

Contrary to Toyota's assertions, Plaintiffs, in tabular form, explained why each of the documents was not entitled to confidential treatment – Toyota's response is basically silent on that issue.

Toyota now requests a briefing schedule (*Id.* at p. 4 notes 1 and 2), but Plaintiffs suggest the Court has the documents and can determine without briefing if a document is worthy of protection.

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2 I hereby certify that a true copy of the above document was served upon the
3 attorney of record for each other party through the Court's electronic filing service
on April 14, 2011.

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5 /s/ Steve W. Berman

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